

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JULIE A. SU,
Acting Secretary of Labor,
United States Department of Labor
Plaintiff,

-against-

ADVANCED CARE STAFFING, LLC, et al.,
Defendants.

No. 1:23-cv-02119-NRM-MMH
(ECF Case)

MOTION TO WITHDRAW AND REQUEST TO SO-ORDER

TO THE CLERK OF THIS COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Tanya K. Warnke and Dechert LLP respectfully request to be withdrawn as counsel of record in this matter and request removal from service of any further pleadings in connection with it. Tanya K. Warnke and Dechert LLP confirm they are not asserting a retaining or charging lien. Tanya K. Warnke and Dechert LLP further confirm that Advanced Care Staffing, LLC, Priority Care Staffing, LLC, and Samuel Klein were aware of, and consented to, their withdrawal as counsel of record in this matter. For the avoidance of doubt, Tanya K. Warnke and Dechert LLP are serving a copy of this motion to withdraw on Advanced Care Staffing, LLC, Priority Care Staffing, LLC, and Samuel Klein contemporaneously with its filing. Defendants Advanced Care Staffing LLC, Priority Care Staffing, LLC, and Samuel Klein will continue to be ably represented by counsel of record.

[Signature Page Follows]

Dated: New York, New York
May 8, 2024

DECHERT LLP

By: /s/ Tanya K. Warnke
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SO ORDERED

The Honorable Nina R. Morrison
United States District Judge